REMARKS

Applicant concurrently files herewith an Excess Claim Fee Payment Letter and fee for excess claims.

Claims 1-16 and 21-35 are all the claims presently pending in the application. New claims 27-35 have been added to more completely define the present invention.

It is noted that the claims have been amended solely to more particularly point out Applicant's invention for the Examiner, and not for distinguishing over the prior art, narrowing the claim in view of the prior art, or for statutory requirements directed to patentability.

It is further noted that, notwithstanding any claim amendments made herein, Applicant's intent is to encompass equivalents of all claim elements, even if amended herein or later during prosecution.

Claims 1-16 and 21-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wodarz et al. (U.S. Patent No. 5,999,912)(hereafter "Wodarz") in view of Agranat et al. (U.S. Patent No. 5,973,696) (hereafter "Agranat").

Claims 25-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wodarz in view of Agranat and further in view of Anderson et al. (U.S. Patent No. 6,021,202) (hereafter "Anderson").

These rejections are respectfully traversed in the discussion below.

I. THE CLAIMED INVENTION

Applicant's invention, as defined for example in the non-limiting embodiment of independent claim 1 (and substantially similarly in independent claims 8 and 13) is directed to a programmable text processing module which loads the document and a parsing editor for initially parsing the document and thereafter incrementally parsing changes committed in the document.

A feature of the present invention, in a non-limiting embodiment, is the automatic (e.g., without user intervention) setting or creation of activemarks which are linked to various commands in response to the parsing performed by the parsing editor (e.g. see page 2, lines 1-5

of the specification and the Abstract).

A further feature of the present invention, in a non-limiting embodiment (e.g., as defined by new dependent claims 27, 32, and 33) is that the marks inserted into the document are only present during a document processing.

An additional feature of the present invention, in a non-limiting emboidment (e.g., as defined by new dependent claim 28), is that the mark control module sets the plurality of marks solely as defined by the parsing editor.

Also a feature of the present invention, in a non-limiting embodiment (e.g., as defined by new dependent claim 29 and 34) is that the document is parsed by a pluralilty of parsing editors, each of the plurality of parsing editors providing a unique functionality.

Another feature of the present invention, in a non-limiting embodiment (e.g., as defined by new dependent claim 30), is that each of said plurality of parsing editors binds different actions to the same activemark set in the document.

A feature of the present invention, in a non-limiting embodiment (e.g., as defined by new dependent claim 31 and 35), is that a mark control module includes one capable of setting the marks in association with any of a plurality of parsing editors and a plurality of markup languages.

An exemplary configuration of an edit system incorporating the activemark structure of the present invention is shown in Fig. 1 of the application.

The conventional systems, such as those discussed below and in the Related Art section of the present application, do not have such a structure, and fail to provide for such an operation.

Indeed, such features are clearly not taught or suggested by the cited reference.

II. THE PRIOR ART REJECTIONS

The Examiner asserts that:

> *[regarding independent claim 1, and similarly 8 and 13] Wodarz*
> *et al. discloses a processing system for processing a document.....*
> *linking means for setting being responsive to the operation of said*

*parsing editor without user intervention (Wodarz on col. 3, lines
35-61 and col. 4, lines 6-11: teaches modifying plurality of tags in
a HTML code........ teaches within the server-resident parser
editing a template with tags are to be converted into a viewable
web page by a HTML browser program).*

*However, Wodarz does not explicitly disclose 'a graphical user
interface'. Agranat et al. (Agranat) on col. 11, lines 39-58:
teaches GUI for the display of HTML documents.*

*It would have been obvious to a person of ordinary skill in the art
at the time the invention was made to have modified Agranat into
Wodarz to provide a GUI to allow the display of HTML documents
incorporated for the display of viewable parsed and edited web
requested web pages at the server-resident parser which will
enhance the display of HTML documents with dynamic content.*

However, Applicant respectfully disagrees.

Firstly, the Examiner asserts that it would have been obvious to a person of ordinary skill in the art at the time of the invention that combining the teachings of Anderson, Wodarz and Agranat would lead to the present invention. Applicant respectfully disagrees and submits that such an assertion is <u>erroneous</u>.

The Examiner is attempting to somehow <u>combine at least three completely different references</u> to arrive at the unique and novel features of the claimed invention. It is clear the Examiner is using impermissible hindsight to urge such a combination of references.

For example, Anderson is intended for Standard Generalized Markup Language (SGML) in particular. Nowhere does Anderson disclose a reference to, or possible applications regarding, editors of HTML or different markup languages.

Instead, Anderson discusses characteristics which differentiate SGML from other markup languages (e.g., see columns 3, lines 1-67 and column 4, lines 1-64 of Anderson) including an extended elaboration of three characteristics of SGML that distinguish it from other markup languages. Anderson discloses that one particularity of SGML is the notion of a document type definition (DTD).

Following a lengthy exposition about the unique characteristics of SGML, including

DTD, Anderson very briefly explains how tags in a SGML structured editor can be automatically inserted. Specifically, Anderson mentions that this SGML structured editor *"can use information extracted from a processed DTD to prompt the user with information about which elements are required at different points in a document as the document is being created. It can also greatly simplify the task of preparing a document, for example by inserting tags automatically"* (e.g., see column 4, lines 66-67 and column 5, lines 1-4 of Anderson). Both the SGML structured editor and the automatic insertion of tags rely on DTD. However, DTD is described at length as a characteristic which is particular to SGML rather than other markup languages.

Thus, since Anderson relies upon DTD which is particular to SGML, it is not obvious that the automatic insertion of tags would have been at the time of the invention (or could be) extended to other markup languages. Applicant submits that since there is such an explicit differentiation between SGML and other markup languages (e.g., based on Anderson), automating such a process for other markup languages is a novel and non-obvious feature.

Specifically, while the references address very specific markup languages, the present invention is generic in nature and can be applied to any markup language. This is completely novel and non-obvious and nowhere taught or suggested by the prior art.

In the present invention, the document is not modified in any manner (e.g., although this functionality is not precluded). The marks and associated actions are "virtual", and typically exist only during the editing session.

Also, in the present invention, the marks do not have to be static/hard-coded in the document (e.g., see page 2, lines 8-10 and 16-18 and page 3, line 1 of the specification). Rather, the marks are defined dynamically by the parser(s) during the parsing of the document. The setting of marks depend solely on the specific function/interests of the particular parser (i.e. the tool analyzing the document), and not on the document itself. Each such tool may bind any action to each activemark, and several tools may bind different actions to the same activemark set in the document. This is a significant feature in terms of new functionality which is nowhere taught or suggested by Anderson or Wodarz as discussed above.

Additional functionality may be added by an enhanced, or new, parser (e.g., a new tool) on the same document "as is" with no changes to the contents of the document or its definition.

That is, a new tool may be added to handle comments in a source file, mark them, and provide an indexing action into related information when selected.

Thus, turning to the clear language of the claims as defined by independent claim 1 (and substantially similarly by independent claims 8 and 13), there is no teaching or suggestion of *"[a] processing system for processing a document, said processing system comprising:*

a programmable text processing module having means for loading the document and a parsing editor for initially parsing the document and thereafter incrementally parsing changes committed in said document;

a mark control module having means for setting a plurality of marks in the document, means for modifying said marks, and means for clearing said marks, and each of said marks comprising selected information in the document and means for linking said selected information with a command, said linking means and said means for setting being responsive to the operation of said parsing editor without user intervention;

a graphical user interface module having means for displaying the document and means for controlling the display of the document; and

an edit control module having means for controlling said text processing module, means for controlling said mark control module, and means for controlling said graphical user interface module" (emphasis Applicant's).

The method of Wodarz, even if combined (arguendo) with that of Agranat (and their attendant disclosure), neither teaches the specific structures of the loading means, setting means, modifying means, clearing means, linking means, displaying means, and controlling means of the invention, nor is such a method a reasonable structural equivalent of the claimed loading means, setting means, modifying means, clearing means, linking means, displaying means, and controlling means.

Thus, for the reasons stated above, independent claim 1 (and substantialy similarly independent claims 8 and 13) are patentable over Wodarz and Agranat

Additionally, dependent claims 2-7, 9-12, 14-16, and 21-24 when combined with independent claims 1, 8, and 13 respectively, define additional novel and non-obvious features.

Further, new claims 27-35 when combined with their respective independent claims have

substantially similar novel and non-obvious features.

Regarding the rejection of claims 25-26 under 35 U.S.C. § 103(a) as being unpatentable over Wodarz and Agranat in view of Anderson, these claims when combined with independent claim 1, are also patentable. That is none of Wodarz, Agranat, and Anderson, alone or (arguendo) in combination teach or suggest

III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicant submits that claims 1-16 and 21-35, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.
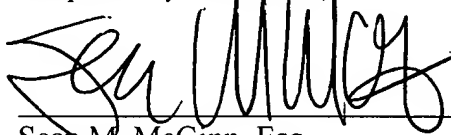
Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: 10/7/03

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